



May 12, 2021

Mr. Austin F. Callwood, Director
Division of Environmental Protection
Department of Planning & Natural Resources
45 Mars Hill
Frederiksted, V.I. 00840-4474

SUBJECT: No. 8 Flare H₂S Exceedance – May 5, 2021

Dear Mr. Callwood:

This letter is submitted in compliance with Condition No. 2.4.5.1 of Limetree Bay Title V permit as a follow-up to the email notification to Ms. Verline Marcellin of the Division of Environmental Protection on May 5, 2021 at 10:12 PM regarding the H₂S exceedances at the No. 8 Flare header.

The Continuous Monitoring System (CMS) at the No. 8 Flare recorded H₂S concentrations in excess of 162 ppmv based on a 3-hr rolling average (ref. Title V permit condition 3.2.5.5 & 3.2.5.6) from 8:00 PM to 10:59 PM May 5, 2021.

The following table provides the 1-hr and 3-hr H₂S concentrations at the No. 8 Flare header during the exceedance event.

Source Parameter (Unit)		FLARE08	
		H2SPPMD (PPM) 001H	H2SPPMD (PPM) 003H
05/05/21	19:00	106.9	76.8
05/05/21	20:00	372.7	179.9
05/05/21	21:00	69.7	183.1
05/05/21	22:00	68.3	170.3
05/05/21	23:00	67.0	68.3

On May 5, 2021, at approximately 7:58 PM, the No. 2 Low Pressure Gas Recovery Unit (2GRU) compressor (C-4850C) tripped on low seal oil pressure. Minutes after, Operations started the other 2GRU compressor (C-4850A) that then tripped on high discharge temperature. As a result, the pressure relief valve at the Suction Compressor Knockout Drum (D-4851) at 2GRU, which provides gas to the compressors, lifted causing elevated H₂S values at the No. 8 Flare. After both compressors tripped, Operations immediately placed the third 2GRU compressor (C-4850B) online which reduced the pressure in D-4851. The compressors are being evaluated for reliability.

If you have any questions or need additional information, please contact Maria Aloyo at (340) 692-3781.

Sincerely,

Neil Morgan
VP, Refinery and General Manager
Limetree Bay Refining, LLC

Electronic Copy: Verline Marcellin (DPNR)